

Schmenk, Colin R -DNR

From: Coleman, Matthew <Matthew.Coleman@arcadis.com>
Sent: Friday, April 10, 2020 12:56 PM
To: Neste, David E - DNR
Cc: Rick Bethel; Jeffrey Howard Danko; Scott D Wahl; Bedard, Michael; Verburg, Ben
Subject: COVID-19 Compliance Process - FTC and Stanton

Dave,

Below is the information for the COVID-19 Compliance Process you requested specific to our FTC and Stanton Street projects.

1. Name of the facility/site: Tyco Fire Technology Center and Tyco Stanton Street Facility
2. Contact information for the central point of contact for the facility/site:
 - a. Name of person notifying: Tyco | Rick Bethel
 - b. Address: 2700 Industrial Parkway South
 - c. City/Town: Marinette
 - d. State: Wisconsin
 - e. Zip: 54143
 - f. Email: Rick.Dewey.Bethel@jci.com
 - g. Phone: 715-735-7411 x 84750
 - h. Primary WDNR Contact for Site or Facility: David Neste
3. State what specific statute/rule/permit condition the individual party is looking for flexibility from.
The long-term private drinking water well sampling program that has been ongoing since 2017 was temporarily suspended due to COVID-19. The approved site work plan from April 2020 included field tasks and other deliverables that have been delayed as a result of COVID-19. Additionally, there may be some deliverables included in our draft schedule provided to WDNR on March 12 that will also be delayed. Tyco will continue communicating schedule adjustments and justifications relative to COVID-19.
4. Include the reasoning/rationale for the request and related to the COVID-19 emergency (1 paragraph)
"Safer at Home" and "Social Distancing" recommendations by state and local governments inhibit travel and the abilities of field personnel to carry out certain tasks in a safe manner. Where possible, we have mobilized local subcontractors to conduct some sampling tasks to maintain compliance with permits to continue meeting operating requirements for specific interim measures. This approach was not feasible for activities that require potential close contact, e.g. entering a residential property for sampling.
5. Include bulleted points of what measures will be taken to mitigate/minimize the potential environmental impacts (if any)
 - a. Interim measures remain in place for all properties within the private drinking water well sampling program and POETs are being maintained by Culligan on an as-needed basis.
 - b. Permitted interim actions with specific reporting requirements continue to be met.
6. Specify the specific time period that the request is for including the rationale.
We are hopeful that field work can continue in June once "Safer at Home" and "Social Distancing" recommendations have been lifted. However, that timeline remains fluid.

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